



**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
MEMPHIS ENVIRONMENTAL FIELD OFFICE**

8383 WOLF LAKE DRIVE

BARLETT, TN 38133-4119

PHONE (901) 371-3000 STATEWIDE 1-888-891-8332 FAX (901) 371-3170

June 4, 2010

AAA Mobile Wash
Attn: John Rumsey
3725 New Getwell Road
Memphis, TN 38118

Re: Compliance Evaluation Inspection (CEI)
AAA Mobile Wash
State Operating Permit (SOP) # SOP-06013
Shelby County

Dear Mr. Rumsey:

On Thursday, May 13, 2010, I conducted a Compliance Evaluation Inspection (CEI) at the AAA Mobile Wash facility located at 3725 New Getwell Road in Memphis, Tennessee. Upon arrival at the facility, I met with you and Mr. Billie Fields (Cougar Chemical Company Service Specialist) and stated that the purpose of my inspection was to evaluate the facility's compliance with its State Operating Permit (SOP). This was accomplished by reviewing the facility's self-monitoring records and reports and conducting a walk-through inspection of the site.

Attached you will find a copy of the EPA Water Compliance Inspection Report, which summarizes the findings of my inspection. The overall score is 3.0, which indicates a satisfactory self-monitoring program. However, there was one deficiency noted.

- AAA Mobile Wash maintains a logbook at the 3725 New Getwell facility that lists the companies which receive their services. A review of the logbook revealed that Interstate Brands Company located in Memphis, Tennessee, is the only site at this time where mobile washing activities provided by AAA Mobile Wash takes place. However, according to permit requirements, AAA Mobile Wash must contact the Tennessee Division of Water Pollution Control, Environmental Field Office (EFO), within 24 hours prior to initially setting up its equipment and commencing mobile washing operations. The appropriate field office should be provided with a telephone and/or pager number at which the system operator can be contacted at all times. It is the responsibility of AAA Mobile Wash to maintain all contact information. There are no records at the Memphis Environmental Field Office (MEFO) showing that we were contacted (within 24 hours) by AAA Mobile Wash regarding mobile pressure washing operations at Interstate Brands Company.

I appreciate your cooperation during the inspection. If you have any questions or comments with regard to the inspection or the CEI report, please call me at (901) 371-3024.

Sincerely,

Maylynne Pynkala

Maylynne Pynkala
Environmental Protection Specialist
Division of Water Pollution Control

Enclosure: CEI report

CC : TDEC/WPC/NCO, Enforcement & Compliance Section
TDEC/WPC/MEFO – File



United States Environmental Protection Agency
Washington, D.C. 20460

Form Approved.
OMB No. 2040-0057
Approval expires 10-31-95

Water Compliance Inspection Report

SECTION A: National Data System Coding (i.e., PCS)

Transaction Code N 5	NPDES SOP-06013	YR/MO/DAY 10/5/13	Inspection Type C	Inspector S	Facility Type 2
Inspection Work Days	Facility Self-Monitoring Evaluation Rating 3	BI N	QA N	Reserved	

SECTION B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) AAA Mobile Wash 3725 New Getwell Road Memphis, TN 38118	Entry Time/Date 5/13/10 10:00 AM Exit Time/Date 5/13/10 12:30 PM	Permit Effective Date 6/30/06 Permit Expiration Date 6/29/2011
Names of On-site Representative(s)/Title(s)/Phone and Fax Number(s) John Rumsey Manager (901) 362-8373 Billie Fields Cougar Chemical Company Service Specialist (901) 362-8373	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number John Rumsey (Manager) 3725 New Getwell Road Memphis, TN 38118 (901) 362-8373	Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

SECTION C: Areas Evaluated During Inspection (Check only those areas evaluated)

x	Permit		Flow Measurement		Operations & Maintenance		CSO/SSO (Sewer Overflow)
x	Records/Reports	x	Self-Monitoring Program		Sludge Handling/Disposal		Pollution Prevention
x	Facility Site Review		Compliance Schedules		Pretreatment		Multimedia
	Effluent/Receiving Waters		Laboratory		Storm Water	x	Other: Sign

SECTION D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

Overall rating was 3.

Name(s) and Signature(s) of Inspector(s) Maylynn Pynkala <i>Maylynn Pynkala</i>	Agency/Office/Phone and Fax Numbers TDEC/WPC/MEFO/901-371-3024 / (Fax) 901-371-3170	Date 6/4/10
Signature of Supervisor Reviewer Eddy Bouzeid <i>Eddy Bouzeid</i>	Agency/Office/Phone and Fax Numbers TDEC/WPC/MEFO/901-371-3023 / (Fax) 901-371-3170	Date 6/4/10
Signature of Management QA Reviewer Terry Templeton <i>Terry R. Templeton</i>	Agency/Office/Phone and Fax Number TDEC/WPC/MEFO/901-371-3018 / (Fax) 901-371-3170	Date 6/4/10



**Water Compliance Inspection Report
(Continued)**

Section D: Summary of Findings / Comments

On May 13, 2010, Mrs. Maylynne Pynkala conducted a Compliance Evaluation Inspection (CEI) at the AAA Mobile Wash site located at 3725 New Getwell Road in Memphis, Tennessee. She met with John Rumsey (Manager) and Mr. Billy Fields (Cougar Chemical Company Service Specialist) and reviewed the facility's monitoring records and discussed the facility's self-monitoring program. Afterwards, Mr. Rumsey, Mr. Fields, and Mrs. Pynkala toured the facility. The following is a summary of the findings and observations.

I. Permit (*Satisfactory*)

State Operation Permit (SOP) number SOP-06013 for the AAA Mobile Wash facility expires on June 29, 2011. The SOP authorizes the company to conduct mobile washing operations. The wastewater generated during the operations is collected and disposed of at EXCEL TSD of TN, LLC.

According to permit requirements, the operation should be such that there is no discharge of wastewater to any surface or subsurface stream, watercourse, or drainage ditch because of an overflow, spill, and/or because of the occurrence of any other condition, that singly or in combination with any of the aforementioned conditions, causes such discharge to any surface or subsurface stream, watercourse, or drainage ditch. In addition, said system must be operated in a manner preventing the creation of a public health hazard.

II. Records / Reports (*Unsatisfactory*)

A copy of the SOP is on file for review.

AAA Mobile Wash is authorized to dispose of the treated wash water at EXCEL TSD of TN, LLC. A discharge agreement with EXCEL TSD of TN, LLC was available onsite for review.

AAA Mobile Wash maintains a logbook at the 3725 New Getwell facility that lists the companies which receive their services. A review of the logbook revealed that Interstate Brands Company located in Memphis, Tennessee, is the only site at this time where mobile washing activities provided by AAA Mobile Wash takes place. However, according to permit requirements, AAA Mobile Wash must contact the Tennessee Division of Water Pollution Control, Environmental Field Office (EFO), within 24 hours prior to initially setting up its equipment and commencing mobile washing operations. The appropriate field office should be provided with a telephone and/or pager number at which the system operator can be contacted at all times. It is the responsibility of AAA Mobile Wash to maintain all contact information. There are no records at the Memphis Environmental Field Office (MEFO) showing that we were contacted (within 24 hours) by AAA Mobile Wash regarding mobile pressure washing operations at Interstate Brands Company.

AAA Mobile Wash maintains a logbook which shows the amount of wastewater collected and when and where it is disposed. The logbook also contains a list of the types of cleaning agents used and the amount of sludge produced and how it is disposed.

AAA Mobile Wash maintains all reports and records required by this permit for a minimum of three years.

III. Facility Site Review (*Satisfactory*)

According to Mr. Fields, all wash water runoff at a job is captured by a vacuum containment system. The wash water is then run through a recycle system and reused through the pressure washer. Any wash water that is not useable after going through the primary filtration process is placed into a settlement tank at the AAA Mobile Wash facility located at the 3725 New Getwell and run through a secondary high efficiency, above-ground coalescing system prior to disposal at EXCEL TSD of TN, LLC. The treatment system used on the trucks is maintained on a daily basis. The treatment system used at the 3725 New Getwell facility is maintained on a monthly basis.

No washing takes place during rain events.

Mobile washing operations do not produce any runoff.

AAA Mobile Wash does not wash out the inside of truck trailers or any heavy construction equipment.

AAA Mobile Wash does not conduct washing activities on state or public lands, in areas not zoned for commercial business, in any areas where commercial or industrial business is not permitted, or in any areas where washing activities is prohibited by any law or ordinance.

IV. Effluent / Receiving Waters (*Not Applicable*)

V. Flow Measurement (*Not Applicable*)

VI. Self Monitoring Program (*Satisfactory*)

AAA Mobile Wash currently has a satisfactory self-monitoring program.

VII. Compliance Schedule (*Not Applicable*)

VIII. Laboratory (*Not Applicable*)

IX. Operation & Maintenance (*Not Applicable*)

X. Sludge Handling (*Not Applicable*)

XI. Pretreatment Program (*Not Applicable*)

XII. Storm Water (*Not Applicable*)

XIII. CSO / SSO (Sewer Overflow) (*Not Applicable*)

XIV. Pollution Prevention (*Not Applicable*)

XV. Multi-Media (*Not Applicable*)

XVI. Other: Sign (Satisfactory)

According to permit requirements, the permittee shall place and maintain a sign attached (magnetically, or otherwise) to the truck or trailer housing the wash equipment during hours of operation. For the purpose of this requirement, there shall be one sign, clearly visible to the public during the wash operations. The minimum sign size should be two feet by two feet with one-inch letters. The sign should be made of durable material, and have a white background with black letters.

EXAMPLE:

Permitted Mobile Wash Collection System with
NO Discharge Allowed
State Operating Permit – SOP- 06013
(NAME OF COLLECTION SYSTEM'S
OWNER & OPERATOR)
(OWNER/OPERATOR'S PHONE NUMBER)

AAA Mobile Wash is in compliance with permit requirements (see photos below).



Information provide on each truck.

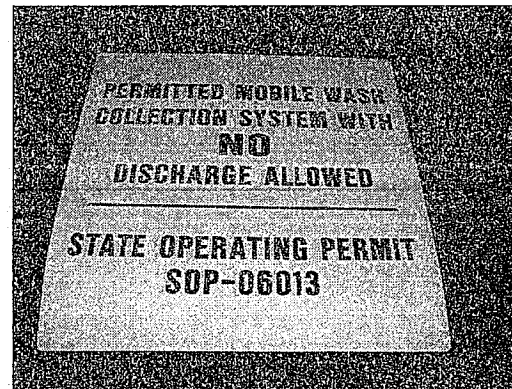


Photo of Magnetic Sign placed on each trucks.